

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: William B. Cook	:	
	:	Chapter 13
Mark Hollingsworth	:	
Plaintiff	:	
v.	:	Adversary No. 18-00275
William B. Cook	:	
Defendant	:	

**DEBTORS ANSWER TO THE MOTION OF MARK HOLLINGSWORTH TO COMPEL
RESPONSES TO DISCOVERY**

William B. Cook, Debtor(s), by and through counsel, Anthony A. Frigo, Esquire, respectfully request the entry of an Order denying Motion of Mark Hollingsworth Motion to Compel Responses to Discovery and in support thereof aver as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied. The Debtor(s) is/are without information sufficient to either admit or deny the averments of this paragraph and they are therefore denied. Strict proof is demanded.
5. Denied. The averments of this paragraph are conclusions of law to which no response is required. They are, therefore, denied. Strict proof is demanded.
6. Denied. The averments of this paragraph are conclusions of law to which no response is required. They are, therefore, denied. Strict proof is demanded.
7. Denied. The averments of this paragraph are conclusions of law to which no response is required. They are, therefore, denied. Strict proof is demanded.

8. Denied. The Debtor(s) is/are without information sufficient to either admit or deny the averments of this paragraph and they are therefore denied. Strict proof is demanded.

WHEREFORE, Debtors respectfully request the entry of an ORDER in the form attached denying Plaintiff's request for an order granting relief from the Automatic Stay.

Dated: July 25, 2019

/S/ Anthony A. Frigo
Anthony A. Frigo, Esquire
175 Strafford Ave., Suite One
Wayne, PA 19087
(O) (610) 687-7784
(F) (610) 687.7783
Anthonyfrigo@msn.com